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12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 EXPEREXCHANGE, INC. a California ) Case No.: **CV-08-3875 JCS**  
15 Corporation, DBA: EXPERVISION, )  
16 Plaintiff, )  
17 vs. ) **JOINT STIPULATION AND ORDER**  
18 DOCULEX, INC., a Florida corporation; ) **FOLLOWING IN-PERSON MEET &**  
19 CARL STRANG, an individual; TERRY ) **CONFER ON DISCOVERY DISPUTE**  
20 MORGAN, an individual; DAVID BAILEY, )  
an individual; JIM GREBEY, an individual; )  
21 DAVID GRIFFITH, an individual, )  
Defendants. )  
22 )  
23 )  
24 

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AND RELATED CROSS-ACTION )

25 Plaintiff ExperExchange, Inc. and Defendants DOCULEX, INC., CARL STRANG,  
26 TERRY MORGAN, DAVID BAILEY, JIM GREBEY, DAVID GRIFFITH hereby stipulate to  
27 provide the following supplemental responses and/or production:  
28

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JOINT STIPULATION AND ORDER FOLLOWING IN-PERSON MEET & CONFER ON  
DISCOVERY DISPUTE

1      **Defendant Demands:**

2      **Document Requests 14 & 15, 30 (includes Interrogatory No. 19).**

3              Plaintiff agrees to produce attachments 4 & 5 for every RSLA entered into between 1999  
4  
5              and August of 2008. Plaintiff may redact customer identifying information.

6      **Document Request 19.**

7              Plaintiff agrees to supplement its response to RFP # 19 by producing the Bo Yan  
8  
9              Interview Summary.

10     **Document Request 31 - 37.**

11              Plaintiff agrees to supplement its response by providing all non-privileged documents  
12              related to Plaintiff's RSLA disputes with the following companies:  
13  
14

15              REBUS, Inc.; PSIGEN, Inc., Atalasoft, Inc., Top Imaging Systems, Inc., HanWang, Inc.  
16

17     **Interrogatories 4, 5, 7 – 12:**

18              Plaintiff agrees to supplement its responses within 10 days following Defendant's  
19              supplemental production as set forth, *infra*.  
20

21     **Interrogatory 18:**

22              Plaintiff agrees to provide supplemental responses by September 18, 2009.  
23

24     **Plaintiff Demands:**

25     **Document Demands to Doculex 98**

26              Defendant agrees to supplement its response by producing internal communications  
27              regarding the software engineering design and development of any software products from the  
28              trade name list by September 18, 2009, to the extent any exist, and have not already been

1 produced.

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3 **Document Demands to Doculex 96 and 108**

4 Defendants agree that if the Court denies Defendant's summary adjudication motion as to  
5 Discovery Cracker, Defendants will supplement their production by providing Discovery  
6 Cracker Division sales documents within 10 days after the Court ruling.

7

8 **Document Demands to Doculex (100, 101, 102, 103, 104, 105)**

9 Defendant agrees to supplement its production regarding customer downloads for RTK  
10 software upgrades for products on the trade name list by September 18, 2009, if any documents  
11 exist.

12

13 **Document Demands to Doculex (92)**

14 Defendant agrees to supplement its production by providing any earlier versions of the  
15 program known as Discovery Cracker (prior to version 5.0) in its custody and control, by  
16 September 18, 2009.

17

18 **Document Demands to Individual Defendants**

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20 **Document Demands to David Bailey (10):**

21 Defendant agrees to supplement his production regarding marketing plans for products on  
22 the trade name list by September 18, 2009, if any documents exist.

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24 Richardson Intellectual Property Law, Prof. Corp.

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28 /s/ Daniel R. Richardson \_\_\_\_\_  
Daniel R. Richardson, Esq.  
Attorneys for Plaintiff

1 Kinsella Weitzman Iser Kump & Aldisert, LLP  
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/s/ David W. Swift

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7 David W. Swift, Esq.  
8 Attorney for Defendants  
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IT IS SO ORDERED

Date: September 2, 2009

